

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**UNITED STATES OF AMERICA**

**v.**

**KEITH RODNEY MOORE,  
Defendant**

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**Case No. 3:21cr42**

**CONSENT MOTION  
TO CONTINUE PRELIMINARY AND DETENTION HEARINGS**

Keith Moore, through his counsel, Laura Koenig, moves to continue his preliminary and detention hearing, currently scheduled for October 12, 2021, to a date after October 13, 2021, pending the disposition of the defendant's state court matter in Richmond City General District Court. In support of this motion, counsel submits the following:

1. On May 4, 2021, the government indicted Mr. Moore on one count of possession a firearm by a convicted felon, in violation of 18 U.S.C. § 922(g)(1). *See* ECF No. 3.
2. Mr. Moore filed a motion to suppress evidence and statements on June 21, 2021, to which the government filed its response on July 6, 2021. *See* ECF Nos. 17 and 22. The Court held an evidentiary hearing on July 26, 2021, and ordered further briefing. *See* ECF Nos. 30, 31. Following a hearing on September 15, 2021, the Court provided an opportunity for the parties to provide further evidence regarding the pending Equal Protection Challenge. *See* ECF Nos. 43 and 44. The Court scheduled a status conference for October 18, 2021. *Id.*
3. Prior to the September 15, 2021, motion hearing, Mr. Moore was arrested on September 7, 2021, in the City of Richmond and charged with assault and battery. In response to the

